

REMARKS

Applicants respectfully request favorable reconsideration of this application, as amended.

Claims 1-9 and Claims 21-38 are pending, of which Claims 21-38 are new. Claims 1-3 and 5-9 are amended herein, and Claims 10-12 are canceled without prejudice or disclaimer. Claims 13-20 were canceled by prior amendment.

Without acceding to the outstanding rejection under 35 U.S.C. §§ 102(b), independent Claim 1 has been amended more particularly to recite certain distinctive features of the Applicants' invention. Applicants respectfully submit that, at least as presently amended, independent Claim 1 distinguishes patentably from U.S. Patent No. 5,530,622 to Takiar et al. ("Takiar"), which forms the basis for the aforementioned rejection.

Specifically, Claim 1 has been amended to additionally recite, *inter alia*, a wiring substrate having a front surface and a rear surface, external connecting terminals arranged over the rear surface of the substrate, a first flash memory chip and a controller chip for the first flash memory chip arranged over the front surface. Amended Claim 1 further recites a resin covering the first flash memory chip and the controller chip, and a case which covers the

resin in such a manner that the external connecting terminals are exposed.

Takiar evidently teaches a fundamentally different arrangement from Applicants' invention as defined in amended Claim 1. Referring to Takiar's Fig. 5, specifically cited in the outstanding rejection, note that substrate 420 is disposed entirely within the case 500 and connected to the exterior via I/O connector 302. By contrast, in Applicants' invention, external connecting terminals arranged over the rear surface of a wiring substrate are exposed from the case (compare, e.g., Takiar Fig. 5 with Applicants' Figs. 3 and 4). Amended Claim 1 thus clearly distinguishes patentably from Takiar.

The secondary references to Feldman and Hara, cited in connection with some of the dependent claims under 35 U.S.C. § 103, clearly fail to remedy the deficiencies of Takiar relative to Claim 1. Moreover, it is apparent that modifying Takiar in such a manner as would be necessary to produce Applicants' invention would require a wholesale reconstruction of Takiar's design, for which one skilled in the art would have drawn no motivation from Feldman and Hara.

It is therefore respectfully urged that the rejection of Claim 1 be withdrawn and that Claim 1, and its dependents, now be allowed.

New Claims 21-38 have been added to protect further aspects of Applicants' invention. New independent Claim 29 recites, *inter alia*, a substrate having a front surface and a rear surface, a first flash memory chip arranged over the front surface of the substrate, a controller chip for the first flash memory chip arranged over the front surface of the substrate, and external connecting terminals arranged over the rear surface of the substrate and exposed from the case. Claim 29 is thus believed to be patentable at least for reasons similar to those discussed above with respect to Claim 1.

A Notice of Allowance is respectfully solicited.

The Commissioner is hereby authorized to charge to Deposit Account No. 50-1165 any fees that may be required by this paper and to credit any overpayment to that Account.

If any extension of time is required in connection with the filing of this paper and has not been requested separately, such extension is hereby requested.

Respectfully submitted,

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I hereby certify that this correspondence is being facsimile transmitted to the United States Patent and Trademark Office on March 3, 2006.


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